

**In the United States District Court
For The District Of Delaware**

CATHY D. BROOKS-McCOLLUM,
& Emerald Ridge Service Corporation
(Derivative)
115 Emerald Ridge Drive
Bear, DE 19701
(302) 832-2694
Plaintiffs(s)

Civil Action No. 04-419 (JJF)

vs.

State Farm Insurance Company
Defendants

JURY TRIAL DEMANDED

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
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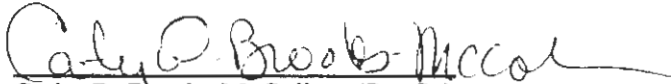
**MOTION FOR REARGUMENT PURSUANT DELAWARE DISTRICT COURT LOCAL RULE
7.1.5**

Plaintiff hereby asks that this court reconsider its' Order dated March 31, 2005. Plaintiff filed a Motion For Summary Judgment against Defendant State Farm. Plaintiff filed this motion against these defendants who are not defendants in any court other then the US District Court Of Delaware. This Order and this Court indicates in its' Order that Plaintiff asked this court to rule upon indemnification pursuant an Order made in Chancery Court proceedings. Plaintiff did not ask that this court make an Order pursuant any Order given in Chancery Court proceedings, in that this court ruled on issues and the crimes committed by other parties and not the crimes committed by Defendant State Farm. Plaintiff asked that this court rule upon Indemnification against State Farm pursuant the crimes they committed and asked this in this court, because this court does govern jurisdiction of over State Farm and the issue of Indemnification and the crimes committed by these defendants fall under the US District Courts. While, Plaintiff is sympathetic that this court does not want to have to rule against one defendant that is governed under its' jurisdiction, without contradicting the ruling of the lower court, the laws does not allow us to incorporate our personal feelings into rulings or judgment. Plaintiff agrees that the Chancery Court should have and should make the proper ruling in its' court governing the defendants under their jurisdiction, and only if the US Court Of Appeals govern all items back under that court. However, in the meantime, Plaintiff does agree and has submitted a copy of the Motion sent to Chancery Court to make

the proper ruling, giving it the opportunity to correct its' error, whereby taking the responsibility away from the US District Court to have to override a decision of one of its' very own. However, the Chancery Court does not govern State Farm, nor does it govern the US District's Courts responsibility to rule upon indemnification of parties governed in their court and under their jurisdiction.

Whereby, Plaintiff respectfully asks that this court rule upon proper indemnification against Defendant State Farm, Plaintiff and Emerald Ridge Service Corporation regarding the claims against State Farm and State Farm only. One party should not have to be subjected to an injustice, because some people fail to honor the laws set by the very parties who are here to enforce them. The courts were not designed to protect persons for not following the laws, and incorporating feelings into laws one may not be in agreement with.

If this Motion is denied, Plaintiff respectfully asks that this court continue with the appeal to the US Court Of Appeals.


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CERTIFICATE OF SERVICE
PROOF OF SERVICE

I Cathy D. Brooks-McCollum hereby certify that on the 2nd day of April 2005, I will and have caused to be served a true and correct copy of the foregoing Motion For Reargument regular postage mail, postage prepaid and via facsimile, upon Defendants:

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